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DrinkerBiddle&Shanley LLP
PRINCETON
FLORHAM PARK

March 1, 2001

Magalie Roman Salas Secretary Federal Communications Commission 445 Twelfth Street, S.W. TW-A325 Washington, DC 20554

Re: Oral and Written Ex Parte Presentation - IB Docket No. 00-203

Dear Ms. Salas:

On behalf of General Communication, Inc. ("GCI"), we hereby report an oral <u>ex parte</u> presentation, made February 28, 2001, in the above-referenced proceeding. The arguments delivered in that presentation are summarized in the attached memorandum. One copy of this memorandum has been filed electronically with this letter pursuant to Section 1.1206(b)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(b)(2).

Jim Sipes and Martin Cary of GCI and Tina Pidgeon and the undersigned of Drinker Biddle & Reath LLP participated in the meeting on behalf of GCI. The presentation was made to Edward R. Jacobs, Julia C. Buchanan and Ronald Repasi of the International Bureau and Ronald F. Netro and Thomas P. Stanley of the Wireless Telecommunications Bureau.

Please address any questions regarding the foregoing to the undersigned.

Sincerely yours,

Kathleen S. O'Neill

Enclosures

Established 1849

MEMORANDUM SUMMARIZING <u>EX PARTE</u> PRESENTATION <u>IB DOCKET NO. 00-203</u>

Representatives of General Communication, Inc. ("GCI") met with members of the Commission's International Bureau and Wireless Bureau. During the meeting, GCI discussed the substance of GCI's Reply Comments filed in the above-referenced proceeding and the materials attached to this memorandum.

Specifically, GCI explained Alaska's unique dependence on satellite technology for basic communications services and expressed its opposition to the implementation of the proposed "demonstrated use" requirement for Fixed-Satellite Service and Fixed Service coordination in Alaska. GCI discussed its satellite-based communications network in Alaska, the services offered on that network, and the importance of these services to rural Alaskans. GCI explained the coverage and capacity challenges already faced by GCI and other earth station operators in Alaska.

GCI explained that the "demonstrated use" standard will impede provision of basic services by constraining the availability of frequencies under three scenarios: (a) transponder failure or catastrophic satellite failure where back-up satellite capacity is on different frequencies from the primary satellite capacity; (b) end of the useful life of a satellite where replacement capacity is on different frequencies; and (c) implementation of new technologies that require the broader use of frequencies on a per site basis will be rendered ineffective where available frequencies are "chipped away" on a site-by-site basis as a result of forced coordination.

GCI is unaware of any coordination problems in Alaska between Fixed-Satellite Service and Fixed Service operators and questions the need to modify the existing rules with respect to Fixed-Satellite Service and Fixed Service coordination in Alaska. Moreover, no coordination difficulties have been identified in the record that would justify changing the current licensing process.

Finally, GCI urged that Alaska be excepted from the "demonstrated use" requirement if adopted, noting that the balance struck between the spectrum capacity needs of Fixed-Satellite Service operators and Fixed Service operators in Alaska should reflect the Alaska's unique dependence on Fixed-Satellite Service.



1. Spectrum Flexibility is Essential for Satellite Operations

2. Alaska is Uniquely Dependent on Satellite Technology for Basic Communications Services

- → Due to Alaska's enormous size, sparse population, terrain and climate, satellite communication of voice, fax, data and Internet is the only practical means of communication
- → In approximately 200 locations in Alaska, satellite technology provides the only means of communication
- All emergency services, healthcare, education, government, military and commercial primary communications in rural Alaska are dependent on the availability of satellite capacity

3. GCI Has Established a Satellite-Based Network to Provide Communications Services to Rural Alaskans

→ GCI provides voice, data, Telemedicine and School Access services to rural Alaska



4. GCI and Other Earth Station Operators in Alaska Already Face Significant Challenges

- → Alaska's geographic position severely limits coverage
- → Satellite capacity is limited because domestic satellite operators have historically built spacecraft with little or no coverage of Alaska
- → Vast majority of C-band capacity is used to deliver interference-causing entertainment services
- → Demand for capacity is growing

5. The Proposed "Demonstrated Use" Requirement Would be Debilitating for Communications in Rural Alaska

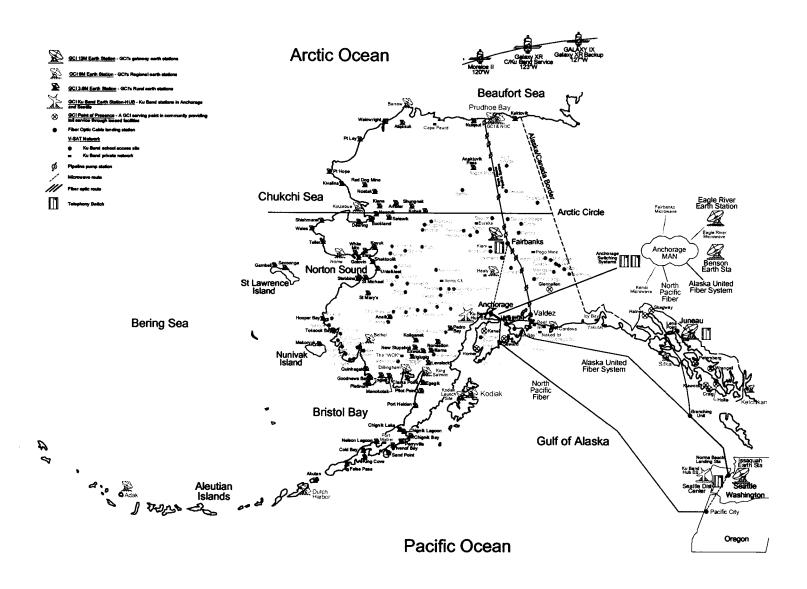
→ The proposed requirement would cripple earth station operators' ability to

GCI NETWORK



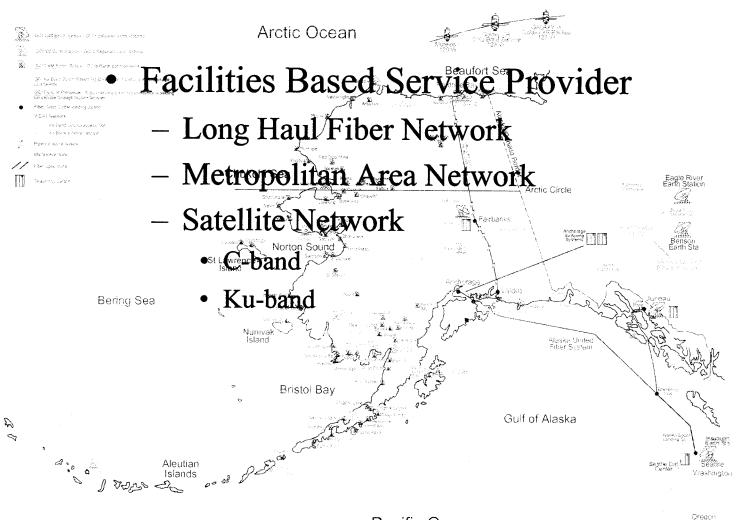








GCI Network Infrastructure

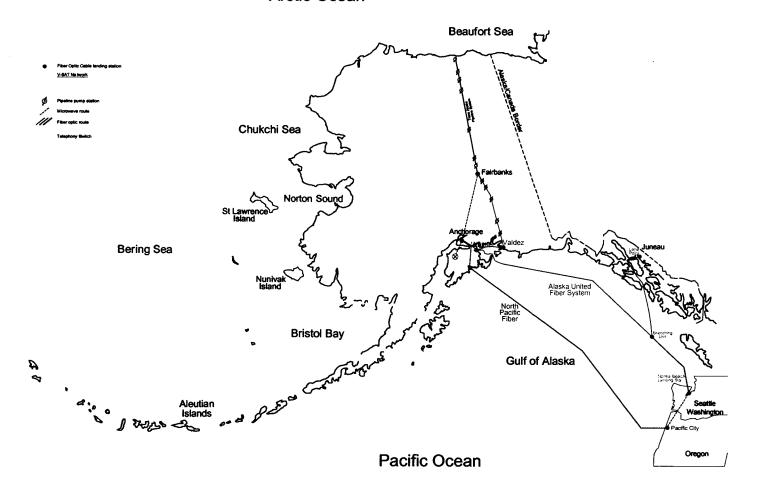


Pacific Ocean



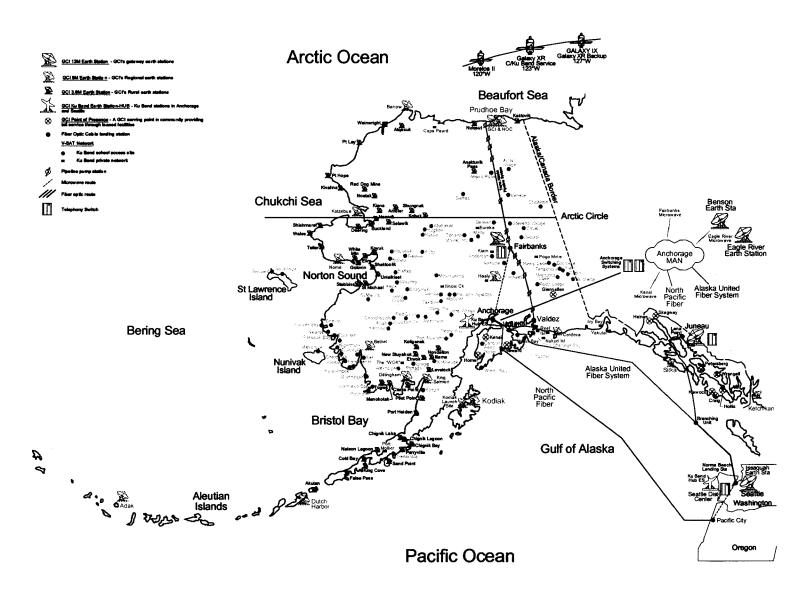
GCI Fiber Network

Arctic Ocean



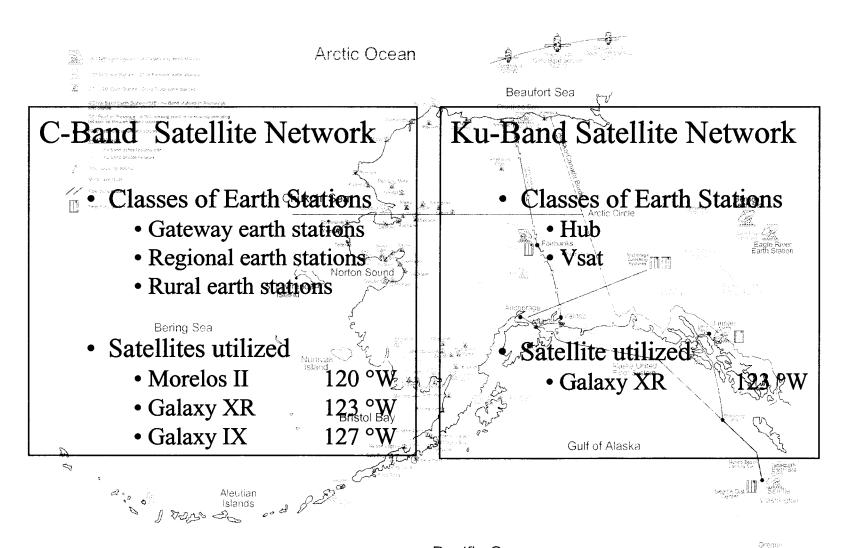


GCI Satellite Network



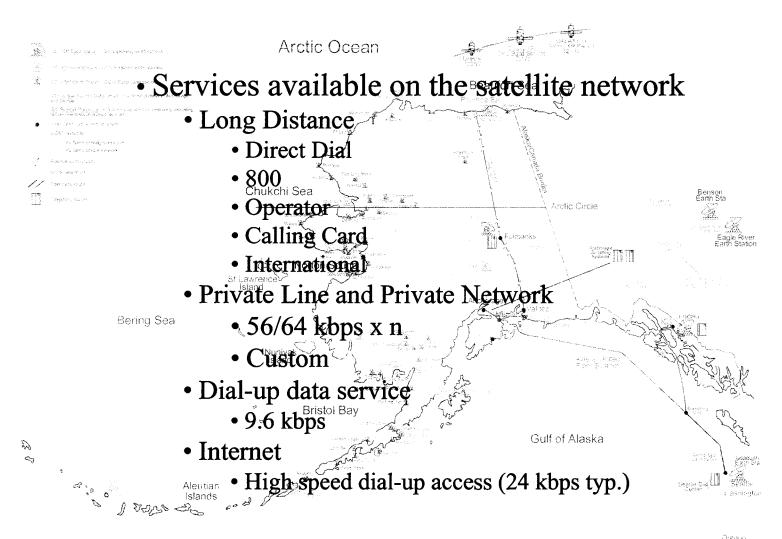


GCI Satellite Network





GCI Satellite Network

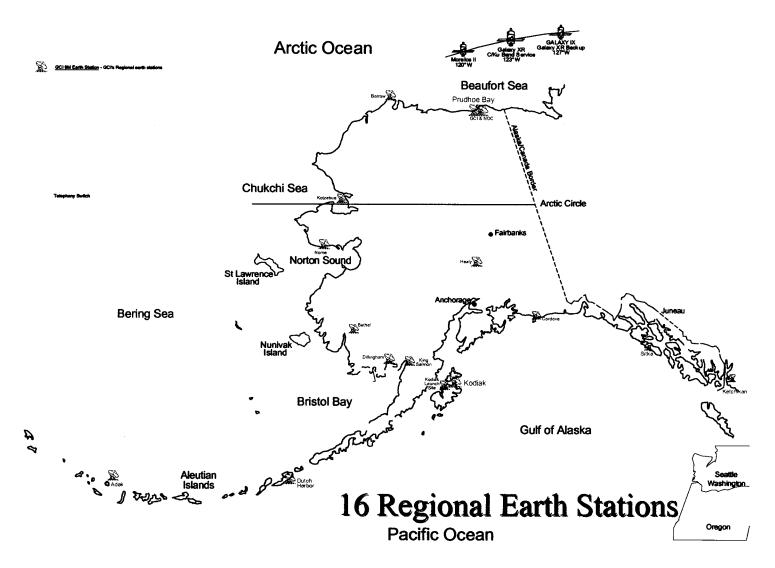


GCI Gateway Earth Stations



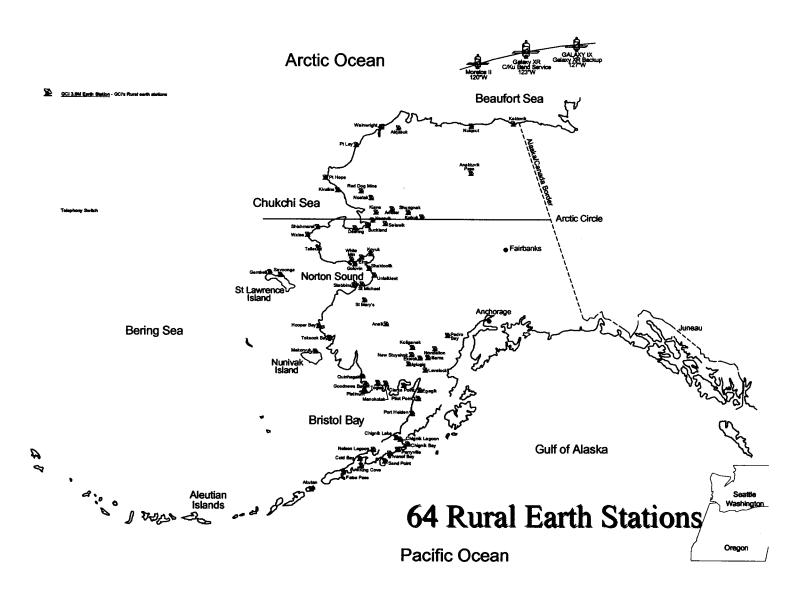
-GCI

GCI Regional Earth Stations



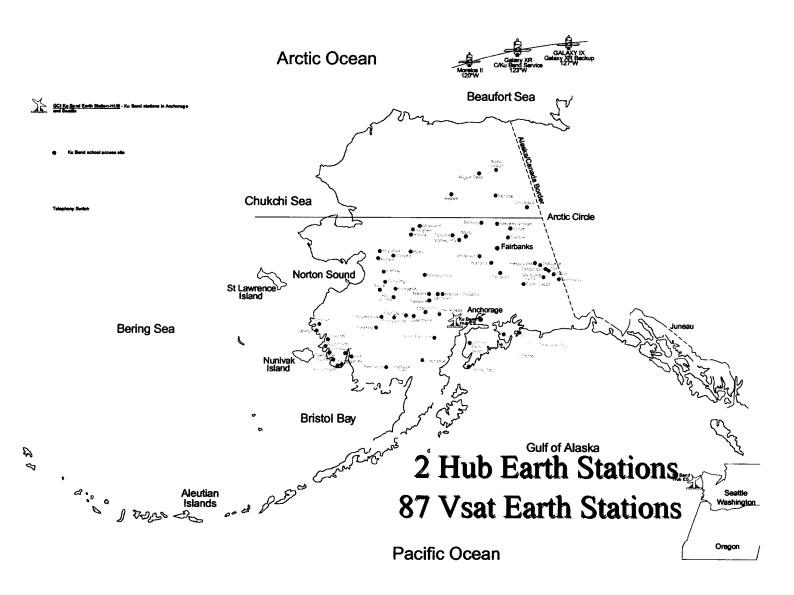
GCI Rural Earth Stations





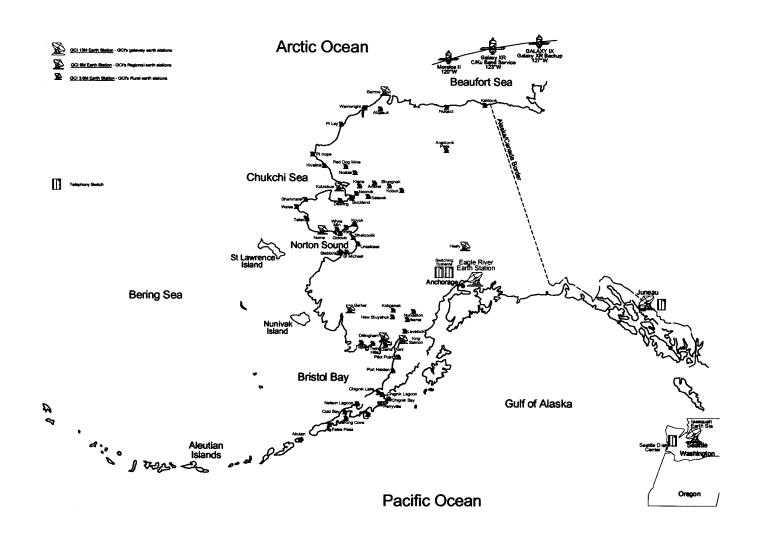
GCI VSAT Network







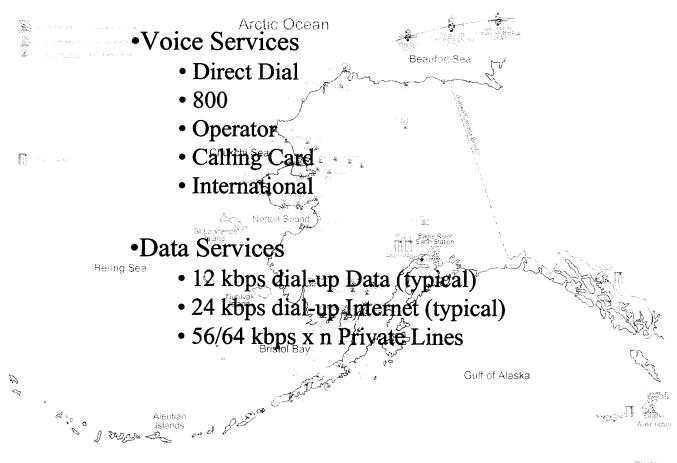
GCI DAMA Satellite Network





GCI DAMA Satellite Network

C-band DAMA Network





Satellites (Galaxy XR)

Satellite Name:

Spacecraft Design:

Orbital Location:

Launch Date:

Launch Vehicle

End of Life:

Polarization:

C-band Payload:

Ku-band Payload:

Galaxy 10R

Hughes HS 601 HP

123 °W Longitude

January 2000

Ariane IV

2015

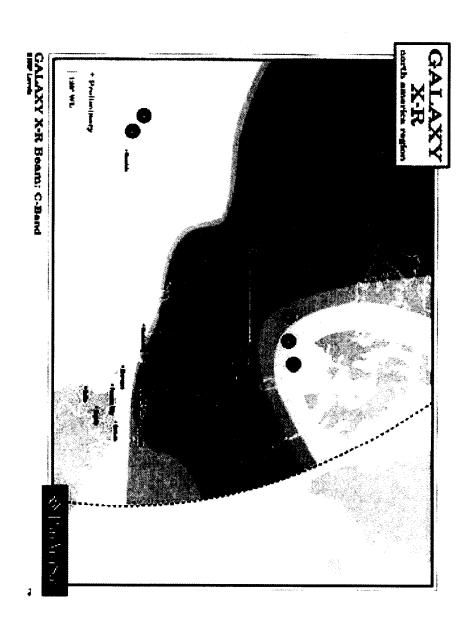
Linear

24 x 36 Mhz - 40 Watts

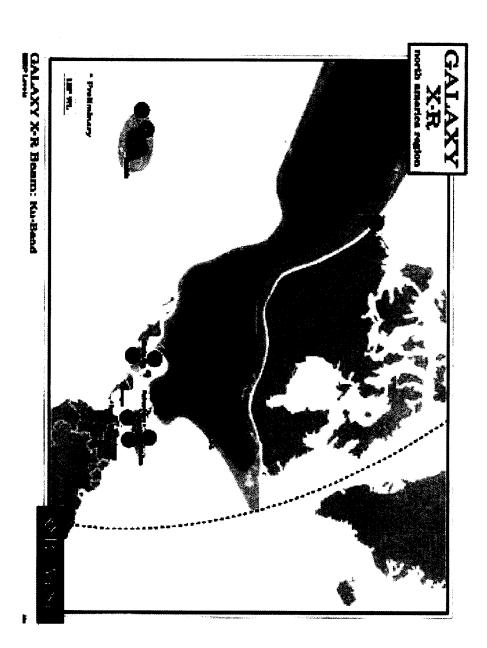
(Enhanced Alaska coverage)

24 x 36 Mhz - 108 Watts

(Enhanced Alaska coverage)











Satellites (Galaxy XR)

Galaxy XR (continued)

C-band Frequencies:

Uplink 5.925 - 6.425 Ghz

Downlink 3.700 - 4.200 Ghz

Ku-band Frequencies:

Uplink 14.000 - 14.500 Ghz

Downlink 11.700 - 12.200 Ghz

Coverage: North America



Satellites (Galaxy IX)

Satellite Name:

Spacecraft Design:

Orbital Location:

Launch Date:

Launch Vehicle

End of Life:

Polarization:

C-band Payload:

C-band Frequencies:

Uplink

Downlink

Coverage:

Galaxy IX

Hughes HS 376

123 °W Longitude

May 1996

Delta II

2008

Linear

24 x 36 Mhz - 16 Watts

(Enhanced Alaska coverage)

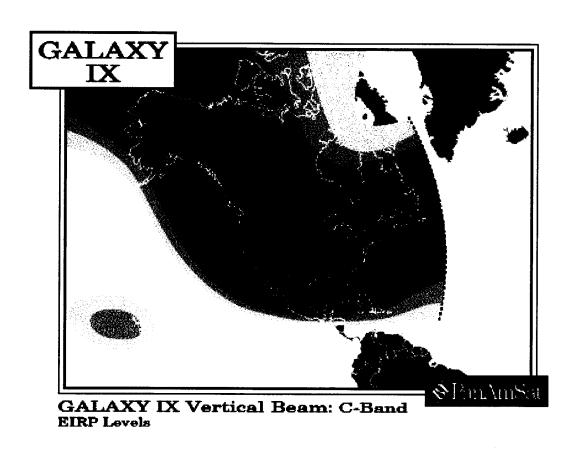
5.925 - 6.425 Ghz

3.700 - 4.200 Ghz

North America, Carribean



Satellites (Galaxy IX)



Typical Satellite Footprint



Satellites (Morelos II)

Satellite Name: Morelos II

Spacecraft Design: Hughes HS 376

Orbital Location: 120 °W Longitude

Launch Date: November 1995

Launch Vehicle

End of Life: Inclined Service

Polarization: Linear

C-band Payload: 12 x 36 Mhz

6 x 72 Mhz

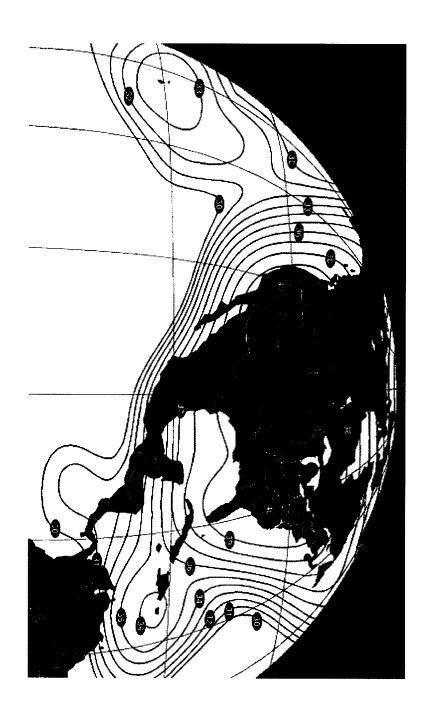
C-band Frequencies:

Uplink 5.925 - 6.425 Ghz

Downlink 3.700 - 4.200 Ghz

Coverage: Alaska, Western United States

Morelos has a Ku communications package, however, it is unusable.



GE4 Satellite Footprint from 101 °W





C4 Satellite Footprint from 135 °W

